

TITLE II ENVIRONMENTAL COMPLIANCE FACESHEET
CRS/Burundi MYAP

Title of MYAP or SYAP: *Burundi MYAP*

FFP Grant Number: *FFP - A -00 - 08-00080-00*

Country/Region: *Burundi / East Africa*

Implementing Partner: *Catholic Relief Services*

Funding Begin: *August 2008*

Funding End: *July 2011*

LOA Amount: *\$15,885,500*

Sub-Activity Amount: \$

Resource Levels:

Commodity: *20,039 MT*

Monetization Request: *\$ 8,192,200*

202(e): *\$ 1,463,400*

ITSH: *\$ 1,388,200*

IEE Prepared by: *Damas Nduwumwami, Consultant*

Date: *July 2008*

IEE Amendment (Y/N): *N*

If "Yes," Date of Original IEE: *n/a*

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

☒ **Request for Categorical Exclusion(s):** activities have no adverse effect (i.e., training, technical assistance; not to include any infrastructure rehabilitation.)

☒ **Negative Determination:** no significant adverse effects expected for activities which are well defined over life of the award.

☐ **without conditions** (no special mitigation measures needed)

☒ **with conditions** (mitigation measures specified)

☐ **Positive Determination:** potential for significant adverse effect of one or more activities. Appropriate environmental review needed/conducted.

☐ **Deferral:** elements not well defined; activities will not be implemented until amended IEE is approved. Briefly describe here:

Environmental Media and/or Human Health Potentially Impacted
(check all that apply):

Air ☐; *Water* ☒; *Land* ☒; *Biodiversity (specify)* ☒; *Human Health* ☒; *Social* ☐; *None* ☐

Summary of Findings:

4.1 Summary of the recommended determinations, mitigation measures and Conditions

A recommendation for *categorical exclusion* is requested for the following activities:

Pursuant to 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc): (iii) Analysis, studies, academic or research workshops and meetings; (viii) programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); and (xi) programs of maternal or child feeding conducted under Title II of [Public Law]480

Distribution of food: for take-home rations, supplementary feeding programs, and food-for-assets activities:

Note: Direct distribution of food itself does not have a direct environmental impact. However, it is important to consider that food basket items- particularly their type and age- affect fuel requirements and resource use as well as conflict over scarce natural resources.

Promotion of optimal infant and child feeding practices

- Mobilize & sensitize communities: about mother & child nutrition and growth; on management of acute malnutrition
- Establish Mother to Mother support groups
- Implement PD HEALTH activities
- Establish stabilization centers, outpatient therapeutic programs, and supplementary feeding programs
- Strengthen both facility-based & community based growth monitoring & coaching
- Provide VCBHAs with necessary equipment & training for growth monitoring

Promote consumption of sufficient food in HIV-affected households

- Train HIV-affected households in proper diets

Promotion of good health-seeking behaviors

- Raise community awareness through IEC
- Train VCBHAs and MTMSGs on prevention and management of childhood illnesses

Promotion of appropriate hygiene & sanitation practices

- Mobilize community to maintain community water points
- Organize a 'star' campaign for top-performing households
- Train VCBHAs on hygiene and sanitation for potable water sources

Promotion of improved production in environmentally sustainable ways

- Facilitate organization of anti-erosion & tree production associations
- Train farmers on: appropriate agricultural practices, etc.
- Train farmers in lowland inland valley mgmt techniques
- Train extension agents to improve their extension skills & in appropriate NRM techniques
- Sensitize farmers on benefits of diversifying their crop & livestock portfolios
- Expose farmers to improved crop varieties

Promote strategies & techniques to diversify & increase revenues

- Sensitize community leaders to the SILC methodology
- Train selected community members in SILC methodology
- Organize community meetings on collective producing & marketing
- Train farmers on sustainable agro-enterprise methodologies & post-harvest practices
- Train farmers groups on identifying & using business development services & good internal management practices
- Train extension agents on improved production techniques & on animal & plant disease prevention control

Promote establishment of community-based early warning & response action plans

- Train community leaders on risk & livelihoods assessment
- Train local leaders in creation of action plans that respond to shocks
- Promote linkages with FAO's food security early warning system
- Assist communities in creating action plans
- Provide small grants to enable communities to begin implementing their action plan

Promote efficient management of household assets in an equitable manner

- Train community leaders in women's rights
- Train men & women in women's rights & gender-balanced responsibilities
- Organize 'positive deviant' working sessions on mutual decision making & mgmt of household assets
- Promote linkages with national women's rights and advocacy groups/NGOs

Monetization sale of Title II Commodities

2. Negative Determinations:

- i) **A Negative Determination with Conditions** per 22 CFR 216.3 (a)(2)(iii) is recommended for these activities:

Promote consumption of sufficient food in HIV-affected households

- Create demonstration keyhole gardens

Promotion of good health-seeking behaviors

- Provide health kits to VCBHAs

Promotion of appropriate hygiene & sanitation practices

- Implementation of selected strategies to encourage hygiene and sanitation practices – such as latrine usage
- Rehabilitation of existing potable water sources

Promotion of improved production in environmentally sustainable ways

- Provide tools and other inputs to community associations for tree production initiatives and ensure implementation through Food For Assets work programs
- Organize a Food For Assets program on erosion control for targeted hillsides
- Rehabilitate targeted lowland inland valleys using a Food for Assets program
- Introduce new crop varieties through local demonstration plots

The conditions attached to these above activities shall include the following:

- For the rehabilitation of existing facilities, and for construction of facilities in which the total surface area disturbed is less than 10,000 square feet, the condition is that these activities shall be conducted following principles for environmentally sound construction, as provided in the Small Scale Construction chapter of the USAID Environmental Guidelines for Small-scale Activities in Africa, which can be found at: www.encapafrica.org.
- For activities associated with seeds, seed supply and planting materials ;
 - **Conditions:** Suppliers shall: 1) ensure appropriateness for the agro-climatic zone to which they are being introduced; 2) avoid introducing exotic invasive species; and 3) avoid providing or promoting genetically modified organisms (GMOs). This requires identifying and mitigating any potential direct adverse impacts on the physical environment and human health and safety (such as due to aflatoxin contamination) arising from distribution of free seeds.
 - **Condition:** non-native plants will not be introduced into protected areas
- For introduction and dissemination of other agricultural chemicals such as fertilizers (not including pesticides) training should be provided in product knowledge. Program activities will use *best management practices for soil fertility and health, as described below:*
 - Integrated Soil Fertility Management (ISFM) – the use of both organic and inorganic sources of nutrients rather than either alone;
 - The use of legume cover crops (plus phosphorous) and green manures by fallow rotation or intercropping;
 - Agro forestry practices – in addition to soil conservation and production benefits, agro forestry transfers/cycles nutrients from within the soil profile (deeper levels to surface);
 - The use of conservation tillage rather than deep plowing (although conservation tillage can be harmful for production systems in certain regions ²);
 - Use farm site manures and household wastes, with or without composting;
 - Choose crops and associated plants that have high nutrient use efficiency.
- **Fertilizers:** As with any technology, it is recommended that fertilizers be thoughtfully employed according to best practice, promoting integrated soil fertility management, within the context of the prevailing biophysical and socio-economic conditions, as well as the desired outcomes. This fact sheet was developed to assist in that regard.
- **Key Hole Gardening:** In addition to the Africa Bureau *Environmental Guidelines for Small-Scale Activities in Africa*, the Consortia will use guidance from the John Snow International: Growing Positively Low Input Gardening (~8MB) http://www.jsiurope.org/docs/growing_positively_book.pdf to help households grow and eat their own healthy and nutritious foods using Low Input Gardening using methods to conserve and manage soil and water resources to use the land productively.
- **Water and Sanitation:** Potential for adverse environmental impacts from water and sanitation activities exists, and it is the responsibility of program designers and implementers to avoid such impacts to the extent possible. For example, wells for human consumption are readily contaminated when additionally used for livestock watering. Water management committee must ensure that separate wells are used for human and animal consumption.

Conditions:

Both water supply and sanitation activities should be conducted in a manner consistent with the good design and implementation practices described in *EGSSAA Chapter 16: Water Supply and Sanitation*. The SO Team and implementing partners shall use the information contained in this chapter, as it provides a thorough discussion of program design and implementation issues that can help avoid numerous

preventable problems. Another useful reference to consult for good water and sanitation design and implementation principles is the document, "Guidelines for the Development of Small Scale Rural Water Supply and Sanitation Projects in East Africa." by Catholic Relief Services and USAID (Title II), August, 2005.

Arsenic: Water quality testing is essential for determining that the water from a constructed water source is safe to drink and to determine a baseline so that any future degradation can be detected. Among the water quality tests which must be performed are tests for the presence of arsenic. Any USAID-supported activity engaged in the provision of potable water must adhere to Guidance Cable State 98 108651, which requires arsenic testing as in "Guidelines for Determining the Arsenic Content of Ground Water in USAID-Sponsored Well Programs in Sub-Saharan Africa."

Potable water will be ensured by regular microbiological contamination of improved wells by simple and cost-effective sample kits for *E. coli* and fecal coliforms are available through a variety of manufacturers (e.g., Idexx Colilert or Coliscan Easygel).

- Medical Waste: Small-scale healthcare activities provide many important benefits to communities, they can also unintentionally do great harm through poor design and management of waste management systems. Healthcare waste is dangerous. If handled, treated, disposed of incorrectly it can spread disease, poisoning people, livestock, wild animals, plants and whole ecosystems.

Conditions:

For VCBHAs, who will use their health kits for basic first aid and treatment activities, the Team must work with its implementing partners to assure, to the extent possible, that the medical facilities and operations involved have adequate procedures and capacities in place to properly handle, label, treat, store, transport and properly dispose of blood, sharps and other medical waste. The ability of the Team to assure such procedures and capacity is understood to be limited by its level of control over the management of the facilities and operations that USAID/Burundi is supporting.

The USAID Bureau for Africa's Environmental Guidelines for Small Scale Activities in Africa (EGSSAA) Chapter 8, "Healthcare Waste: Generation, Handling, Treatment and Disposal" (found at this URL: <http://encapafrika.org/SmallScaleGuidelines.htm>) contains guidance to promote proper handling and disposal of medical waste, particularly in the section titled, "Minimum elements of a complete waste management program."

ii) Negative Determination with conditions (Umbrella IEE)

The following activities are determined to qualify for Negative Determinations with Conditions (22 CFR 216.3(a)(2) (iii)). MYAP/Burundi has developed design criteria for such actions which, if applied in the design of the action, will avoid a significant effect on the environment:

(All activities involving sub grant activities) for all program areas that are likely to have sub-grants to local Non Governmental Organizations (NGOs) and Community Based Organizations (CBOs) including:

Promote establishment of community-based early warning & response action plans:

Provide small grants to enable communities to begin implementing their action plan

Any grants or other monetary transfers of USAID funds (e.g., sub-grants) to support this program's activities must incorporate provisions that the activities to be undertaken will comply with the environmental determinations and recommendations of this IEE (see section 4.1.4 for details and the Environmental Review

Form sample at <http://www.encapafrica.org/compliance.htm>). This includes assurance that the activities conducted with USAID funds fit within those described in the approved IEE or IEE amendment and that any mitigating measures required for those activities be followed.

Condition: In the event that sub-grants and small grants will support activities with the potential for impact on the environment, FFP, USAID /Burundi and the implementing partners have the responsibility for assuring that an environmental screening process is introduced using the Africa Bureau Environmental Review Form (see annex) in their sub-grant procedures.

3. Pesticides and GMOs: This IEE does not cover procurement, use, transport, storage or disposal of pesticides or other toxic materials, which would require an amended IEE, pursuant to 22 CFR 216.3(b), USAID's Pesticide Procedures. Likewise, any activities implicating the testing and use of genetically-modified organisms (GMOs) or life-modified organisms (LMOs) shall be subject to review under the Agency's Biosafety procedures.

4. Monitoring and Evaluation: As required by ADS 204.3.4, the USAID LPC/Burundi team and activity implementing partners will actively monitor and evaluate whether the environmental features designed for the activity resulting from the 22 CFR 216 process are being implemented effectively and whether there are new or unforeseen consequences arising during implementation that were not identified and reviewed. If additional activities not described in this document are added to this program, an amended environmental examination must be prepared and approved. The USAID/Burundi team will also ensure that provisions of the IEE concerning mitigative measures and the conditions specified herein along with the requirement to monitor be incorporated in all contracts, cooperative agreements, grants and sub-grants.

4. Monitoring and Evaluation: As required by ADS 204.3.4, the USAID LPC/Burundi team and activity implementing partners will actively monitor and evaluate whether the environmental features designed for the activity resulting from the 22 CFR 216 process are being implemented effectively and whether there are new or unforeseen consequences arising during implementation that were not identified and reviewed. If additional activities not described in this document are added to this program, an amended environmental examination must be prepared and approved. The USAID/Burundi team will also ensure that provisions of the IEE concerning mitigative measures and the conditions specified herein along with the requirement to monitor be incorporated in all contracts, cooperative agreements, grants and sub-grants.

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:

USAID/FFP MYAP Clearances:

Acting Mission Director:


Andrew Karas

Date: July 31, 2008

Food for Peace Director:


Jeff Borns

Date: 8-25-08

USAID/Washington Clearances:

DCHA Bureau Environmental Officer:


Erika Cresceri

Date: 11/7/08

Approved: ☒

Disapproved: ☐

Optional Clearances:

Acting Regional Food for Peace Officer:
(NAIROBI/FFP)


Nicholas Cox

Date: July 31, 2008

FFP Officer:


David Kinck

Date: July 31, 2008

Mission Food for Peace Officer:

Date: _____

Mission Environmental Officer:
USAID/EA


David Kiryua

Date: July 31, 2008

Geographic Bureau Environmental Officer:

Date: _____

General Counsel:

Date: _____

TITLE II INITIAL ENVIRONMENTAL EXAMINATION

Program/Project Data:

Program/Activity:	Title II Burundi/Multi-Year Assistance Program
CS Name, Country/Region:	Catholic Relief Services / Burundi / East Africa
Operational Areas:	Kayanza, Kirundo and Muyinga Provinces in northern Burundi

1. BACKGROUND AND ACTIVITY DESCRIPTION

1.1 Background

Catholic Relief Services, in partnership with International Medical Corps, proposes to use Title II resources in this 2008-2011 MYAP to reduce food insecurity of vulnerable populations in Burundi. Specifically, this project will enhance human capabilities via access to better health and nutrition and potable water, increase livelihood capabilities through environmentally-sustainable agricultural production and off- and on-farm income activities, and improve community resilience and capacity to respond to shocks.

This Initial Environmental Examination (IEE) was carried out at the request of CRS in compliance with USAID's Environmental Procedures (known as 22 CFR 216 or Reg. 216) to ensure that (1) the environmental consequences of USAID-funded activities are identified during the design and implementation stage, and that these consequences are considered prior to funding approvals and a decision to proceed with activity implementation; and (2) if possible, alternative activities are identified that preserve or restore the natural resource base upon which many of the beneficiary livelihoods depend. This IEE is reflective of the focus of the greater proposal on the development-relief approach to programming detailed in the P.L. 480 Program Policies and Proposal Interim Guidelines.

1.2 Description Of Activities

CRS Burundi is embarking on the road to fight poverty and food insecurity in three watershed areas in the provinces of Kayanza, Kirundo and Muyinga through grassroots empowerment for community capacity building. The proposed program has three strategic objectives:

SO 1: Vulnerable households have enhanced human capacities.

SO 2: Vulnerable households have enhanced and sustainable livelihoods capacity.

SO 3: Vulnerable communities have enhanced resiliency.

CRS/Burundi, along with IMC, will undertake activities that will build the capacity in the targeted communities. This program is to be funded through the monetization of PL 480 Title II commodities and cash. Below is a table that contains all the proposed strategic objectives, intermediate results, and MYAP activities as well as a brief description of each activity.

Activities	Description
Strategic Objective 1 Vulnerable households have enhanced human capacities	
<i>IR.1.1 Households practice optimal infant and child feeding practices</i>	
Mobilize and sensitize communities to raise awareness regarding mother and child nutrition growth	In consultation with the communities, the project will identify the barriers linked with poor child feeding and together will promote the best strategies that will be adopted by the communities in regard to best child feeding practices. The project will enable the community to help themselves in changing their old practices and in the end will result in new behaviour. On a voluntarily basis, small groups of mothers who have been trained on how to promote complementary feeding practices will disseminate this information amongst other women and breastfeeding mothers by word of mouth and also practice the cultivation of vegetables necessary for a balanced diet. This will enable communities acquire knowledge regarding mother and child nutrition growth.
Establish Mother to Mother Support Groups to promote optimal IYCF	Small groups of mothers will be trained in the strategies that promote optimal IYCF. Selected women will learn to cultivate the fresh vegetables that had been lacking in the feeding diet such as onions, beans, tomatoes, and cabbage rich in vitamin A. CRS and IMC will make sure that supplementary tablets rich in vitamin A are given to children aged one to four every six months and the same time pregnant mothers get iron tablets to prevent anaemia. CRS will monitor the implementation of this activity through a small network established between these women's support groups.
Identify most vulnerable communities and implement PD HEARTH	Targeted households will be invited to chosen places in their communities (under a tree, or at a location where stories are normally shared or conflicts are settled) and will be (on a regular basis during the implementation of the project) trained in good practices regarding infant and child feeding.
Strengthen facility-based growth monitoring and coaching	At the village level, some primary health care facilities will be installed. These facilities will be chosen by the people themselves and will be simply equipped by the community herself. Simple training and coaching will be addressed and growth will be monitored at these facilities. While CRS and IMC will be facilitating this capacity, local people will be learning other preventable low-cost measures recommended for coaching simple treatment amongst these locals.
Strengthen community-based growth monitoring and coaching	VCBHA's will be trained in proper growth monitoring and coaching techniques.
Provide tools to VCBHAs for growth monitoring	Besides training in measurement of mid-upper arm circumference, bracelets will be provided.
Organize CTC services for start-up	During the first year, the project will support supplementary feeding for malnourished children and initiate new CTC services for severely malnourished in targeted areas in conjunction with

	UNICEF and MOH. In addition it will provide supplies and Title II food for supplementary feeding under CTC programs.
Train health centre staff in disease prevention	This activity will be undertaken in order to teach HC staff simple, inexpensive or even cost free ways of avoiding diseases.
Supply HCs with necessary screening and food preparation materials, along with RUTF	Because some mothers in the target areas are ill-equipped with cooking materials, the project will supply the necessary screening and cooking tools so that during the demonstration participants will learn how to prepare food with locally available materials.
Organize take-home protection rations for households with severely malnourished children enrolled in OTPs	Nutrient deficiencies are the root causes of several diseases reported in the health posts of the target communities. Malnutrition in particular hits the poor and the families with big number of children. By providing take-home rations, CRS-IMC will be supporting these families to enable them to support themselves.
Organize supplementary feeding services for moderately malnourished children	This activity will help to improve the health of vulnerable children at risk of becoming severely malnourished.
<i>IR.1.2 HIV-affected individuals on ARTs have access to appropriate supplemental food</i>	
Provide monthly take-home rations to identified PLHIV and HIV-affected households in associations	Nutrients deficiencies are the root cause of several diseases reported in the health posts of the target communities, including HIV/AIDS patients. By providing take-home rations CRS-IMC will be supporting PLHIV and HIV-affected households to enable them to support themselves.
Train HIV-affected households in proper diets at distribution points	This activity is meant to encourage HIV-affected households by training them on how to cope with the disease when one is properly eating.
Create demonstration keyhole gardens with HIV/AIDS associations	The project will identify plots of gardens belonging to HIV/AIDS associations and will facilitate the creation and demonstration of keyhole gardens.
<i>IR.1.3 Households practice good health-seeking behaviour</i>	
Train VCBHAs and MTMSGs on prevention of diarrhea, malaria, and ARI	A good nutrition program must find ways of identifying mothers and children at risk and providing them with supplementary food they need. It must also help the community to prevent diarrhoea and malaria.
Mobilize communities and raise awareness of optimal health-seeking behaviors through IEC	CRS-IMC will make sure to design necessary actions and procedures that will reduce risk at a very least cost. These actions and procedures will outline a comprehensive management plan for a complete healthcare waste management. Information and education will put emphasis on major threats from improper waste handling.
Train VCBHAs on management of childhood illnesses	CRS will assist in setting up VCBHAs which will mobilize people in the target communities and train/educate them so they become the major forces for their own self-improvement.
Provide health kits to VCBHAs	The project will provide some elementary medical tools to

	VCBHAs who will visit their communities and eventually assist with first aid.
<i>IR.1.4 Households use appropriate hygiene and sanitation practices</i>	
Implement selected strategies for promoting optimal hygiene and sanitation practices	Good sanitation and hygiene are keys to preventing contamination. Targeted households will be trained in attitude towards latrine use as well as potential environmental impacts such as diseases, increased costs, depletion of fresh water resources, and contamination from improper disposal of solid waste including human excreta.
Rehabilitate existing potable water sources using Food-for-Assets/Cash-for-Work and community participation	In the past there has been some construction of gravity water supply and other water sources and because of poor maintenance the water is no longer running. This project will rehabilitate these water systems and at the same time train water management committees for maintenance and repair to insure sustainability.
Mobilize communal water committees and individual water point committees to improve & maintain community water points	Project staff will train water management committees in the maintenance and repair of water points to promote sustainability.
Train VCBHAs on potable water, hygiene and sanitation (point-of-use)	VCBHAs will receive thorough training, as well as suggested techniques for teaching the concepts and practices to those they serve.
Facilitate “star” campaign for top-performing households	In order to encourage performing households, the project will recognize those households which have distinguished themselves by accomplishing the project’s requirements. This recognition will include being honoured with star recognition, material items, and / or public recognition.
Strategic Objective 2 Vulnerable households have been enhanced and sustainable livelihoods capacity	
<i>IR.2.1 Vulnerable households are practicing appropriate soil conservation and water management techniques</i>	
Facilitate the organization of community members into anti-erosion and tree production associations	This activity will be organized to improve the livelihood of the poor and will be conducted in environmentally sound manner which helps local communities obtain wood for their energy at the same time protecting hillsides against erosion.
Train farmers and farmers' groups on soil erosion prevention techniques	These techniques will be designed with clear practices that help prevent environmental damage.
Provide tools and other inputs to community associations for anti-erosion and tree production initiatives and ensure implementation through Food For Assets work programs.	This activity promotes appropriate and sustainable soil and water conservation measures through building of contour berms on hillsides and through the creation and maintenance of tree nurseries for utilization in agro-forestry practices.
Organize an Assets-For-Asset program on erosion control for targeted hillsides	Idem

Rehabilitate targeted lowland inland valleys using a Food-For-Asset program	These valleys have been put under use some ten to fifteen years ago. Ever since, they are no longer maintained and their productive potential is forgotten. By rehabilitating these valleys small farmers will boost their crop production. CRS will assist in this program by rehabilitating existing structures and encouraging community involvement.
Conduct training sessions for wetland users in lowland inland valley management techniques	Maintenance of these ecosystems is rather problematic in these areas since users think in individual terms while the water they use in these “marais” is commonly shared. So CRS will train users’ in management techniques so that they may increase their understanding of a common good. CRS will also assist lowland valley users in engineering works designed to stabilize the soil and control the rate of surface flow, while also establishing vegetative cover.
Train farmers and farmers' groups on appropriate agricultural techniques (compost, plant spacing, planting in rows, crop rotation)	Farmers need these cultivation practices to improve their crop and pasture productivity. These practices are proven to be important in the maintenance of soil fertility and improve the possibility for sustained food output.
Train farmers and farmers' groups on improved techniques for raising livestock	As said above, the emphasis will be on fodder supply, improved animal wellbeing, and improved animal management. Where subsistence production is practiced like here, it is critical to maintain adequate forage, a mix of species, and a herd structure to keep livestock in place. These management practices must fit the environment. For this reason, it is important for farmers and farmers’ groups to understand the nature of the existing ecosystems and the dependence of these by human and animal components.
Sensitize farmers and farmers' groups on the importance and benefits of diversifying their agricultural and livestock portfolios	The issue here is to maximize production on a given plot of land. Attention will be given to this integration of cropping, forage production and raising animals.
Conduct training sessions with farmers and farmers' groups on crop disease prevention and control	Prevention will involve using timely planting, inter-cropping, resistant varieties, and manual destruction of diseased crop residue. Control will involve only non-chemical methods, such as destruction of live diseased plants to prevent spreading.
Conduct training sessions with farmers and farmers' groups on animal disease prevention and control	Prevention and control of animal diseases will involve good management practices, but will not involve distribution of drugs or chemicals.
Sensitize farmers and farmers' groups on correct cultivation techniques for new crop varieties	New crop varieties introduced are those that have been tested locally by the national research institute ISABU and have proven to be more productive.
Train farmers and farmers' groups on improved seed selection, production, and conservation techniques	By using agro ecological techniques, farmers will be able to protect natural species and conserve their habitat while also increasing their agricultural production and incomes.
Organize working sessions for farmer groups with assistance from national and other	Get researches and farmers together to share ideas, practices, problems and opportunities. This will involve hands-on exposure

research institutions on improved crop varieties.	to proper techniques and demonstration plots with improved varieties.
Conduct sensitization and training sessions on the use of organic fertilizer	Organic fertilizer (manure and compost) is often available but is not being managed to its potential for improving or maintaining soil fertility.
Organize community market-based livelihoods fairs for agricultural inputs	Livelihoods fairs will engage local suppliers and selected local families to increase the chances for success in reducing household food insecurity through the provision of necessary agricultural inputs. The activity also promotes local production and marketing by engaging local and regional suppliers.
Train agricultural extensions agents in improving their extension skills	Agricultural extension agents were a key to agricultural development in the country during the 1980's. But since the disruption of such services during the decade-long conflict in Burundi, rural farming households have struggled to regain pre-war production levels while depleting natural resources. Population increases, illiteracy and limited resources conspire to prevent farming families from embracing improved farming techniques. Extension agents, properly trained in the skills of teaching adults, can have a significant positive impact on overall food security in a community.
Train agricultural extensions agents in improved and appropriate Natural Resource management techniques	By training extension agents, CRS endeavours to promote the benefits of environmental conservation while increasing agricultural production and, eventually, household incomes. Many practices and management techniques don't require a great deal of labor, and some even reduce labor demands.
<i>IR.2.2 Vulnerable households have adopted strategies and techniques to diversity and increase revenues.</i>	
Popularize the SILC methodology with the administrative and community leaders in the target zones	Savings and Internal Lending Committees can provide necessary capital for agricultural and non-agricultural activities that, if successful, can significantly improve household food security. Previous experience in Burundi has shown that even the uneducated poor can accumulate savings given the opportunity. But for SILC to have a chance to succeed, community leaders must first understand and support the concept.
Train community based Field Agents in the SILC methodology	Successful implementation of the SILC methodology also requires well-trained local agents who can walk with the new savings groups as they start up.
Organize community meetings on collective producing and marketing and provide training on sustainable agro-enterprise methodologies.	Meetings and trainings will be held locally whenever practical to reduce the need for participants to travel away from their families and fields. Care will be taken to encourage participation by both men and women. Collective producing and marketing improves a communities chance to get fair market value for crops that are in demand, thus benefiting all those who participate. Agro-enterprise activities serve to diversify and expand income opportunities if they are done in a manner that doesn't harm the environment and jeopardise future production potential.
Train farmers' groups on good internal	Farmers groups and associations, already existing or newly

management practices and in identifying and using business development services	formed, will need specific skills to properly manage their endeavours if they are to be successful and sustainable. Assistance and advice in business development is available if one knows how to access such services.
Train farmers and farmers' groups in post-harvest practices	Studies have shown that the seriousness of the 'hungry season' could be diminished through more effective post-harvest skills and practices. The best and most abundant crops don't ensure food security without proper storage practices. Some post-harvest practices can even add value to the commodity.
Train agricultural extension agents in improved production techniques	Agricultural extension agents were key to agricultural development in the country during the 1980's. But since the disruption of such services during the decade-long conflict in Burundi, rural farming households have struggled to regain pre-war production levels while depleting natural resources, population increases and average family parcel sizes decrease. By training extension agents, CRS endeavours to demonstrate the benefits of environmental conservation while increasing agricultural production and, eventually, household incomes.
Train and reinforce the capacities of agricultural extension agents on animal and plant diseases prevention and control	The impact of animal and plant diseases can be reduced, sometimes significantly, through proper knowledge and timely action. Not all treatments are costly, but proper diagnosis is an important first step. Extension agents will be trained to provide farmers with more than one option for treatment where possible.

Strategic Objective 3 Vulnerable communities have enhanced resiliency

IR. 3.1 Communities and local government agents have established community-based early warning and response actions plans

Conduct trainings on risk and livelihoods assessment using the participatory learning approach methodology	Trainings will be held locally and over several weeks or months. Participants will learn to see the strengths and weaknesses of their community and to identify the most important risks they face in their everyday lives.
Organize workshops to help communities create community action plans	As risks and barriers to safer, healthier lives are identified, communities will be encouraged to create plans to reduce or mitigate the identified risks in a collective way. The level of complexity and comprehensiveness of the plan will vary by communities.
Train local government agents to assist communities in creating action plans that identify and respond to shocks	In order for the planning and implementation of community action plans to be sustainable, local leaders and government agents much have the needed skills and knowledge to support communities working to help themselves.
Provide small grants to enable communities to begin implementing their action plans, as appropriate	Grants will be awarded based upon established criteria designed to reward communities who are organized and committed to improving the resilience of their community. Local input of labor and materials will be a necessary component of any successful community improvement.

<i>IR. 3.2: Vulnerable households and other households are efficiently managing their assets in an equitable manner</i>	
Organize 'positive deviant' working sessions on mutual decision making and management of household assets	There are households where the wife participates in decisions that affect the family and their resources/assets. Those households will be identified and asked to participate. If agreeable, they will receive training in communication skills and will then be asked to participate in discussion groups with others from the community who may be open to learning the benefits of having the wife participate fully in the decision-making processes within the household and family.
Train men and women about women's rights and gender-balanced responsibilities	Women in Burundi have traditionally not be afforded many rights, even though they contribute a significant amount of labor and skills to maintain the well-being of the family. A more equal division of responsibilities would strengthen the household and the community. Both men and women need to be reached if any significant advancement is to be made in this area.
Train leaders in women's rights	Community members need the support of their leaders to bring about change as significant as this. Leaders will need a fundamental knowledge and understanding of women's rights in order to participate or at least not put up obstacles to the process.
Promote linkages with national women's rights and advocacy groups/ NGOs	There are many active and influential women's groups in Burundi. Local men and women, as well as the national organizations themselves, can benefit greatly by having access to and strong links with these important organizations promoting women's rights.

1.3 Purpose And Scope Of IEE

This IEE is accompanying a Multi-Year Assistance Program (MYAP) proposed by Catholic Relief Services to USAID/FFP for the period beginning in August 2008 and ending in July 2011, and it reviews activities designed in the multi-year program for Burundi which may have foreseeable effects on the environment.

2. COUNTRY AND ENVIRONMENTAL INFORMATION

2.1 Country Overview

Burundi, a small landlocked country covering 27,834 square kilometers is a former Belgian colony which won its independence in 1962. To the north, it borders Rwanda. Burundi and Rwanda were administratively linked and known collectively as Ruanda-Urundi. The two countries are affiliated culturally; they have almost the same size, geography, ethnic composition and much of the predominant livelihoods.

Burundi has high human density and is a rural nation of peasant farmers (over 90% of the population are agriculturists). As a result, land for cultivation is a constant issue and a major obstacle to effective implementation of environmental policies.

Burundi has a temperate climate and an annual rainfall which is adequate for three growing seasons. There are four natural ecological regions in Burundi: the Imbo, the Congo-Nile Massif or Mugamba, the central plateau, and the Kumoso and Bweru Depressions. There are in addition, ten geographic subdivisions. Burundi belongs at two major basins: the basin of the Congo River and the Nile River basin. Waters on the west of the Congo-Nile crest go in the Lake Tanganika and those in the east run into the Lake Victoria and consequently in the Nile River. This is the reason why the southern source of the Nile is in Burundi. Given its rapid population growth, the continuing crisis and its limited resources, Burundi is facing a number of serious environmental problems which need strong educational program to curb their detrimental effects.

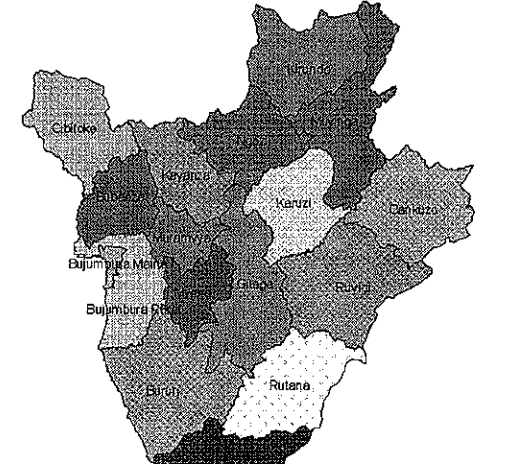
Overexploitation of land, smaller farms (less than half a hectare), and fewer fallow periods have led to severe land degradation. Loss of soil fertility, soil erosion, and silting of rivers are the most critical environmental issues. Soil erosion is a chronic problem throughout the country. During the past 14 years deforestation rates have risen dramatically. Some groups and individuals are using virtually all of the forested areas (including parks and reserves) as the main source for income generation and wood products for their various services.

Heavy population pressure and population movements have led to unsustainable land use practices. Marginal lands are increasingly being cultivated, and ecologically significant lands are vulnerable to encroachment. In addition, adverse policy incentives, lack of sound property rights and long term investments in the land, and weak regulatory and enforcement authority are root causes while resource use planning is hampered by poor monitoring and lack of environmental and natural resource related data.

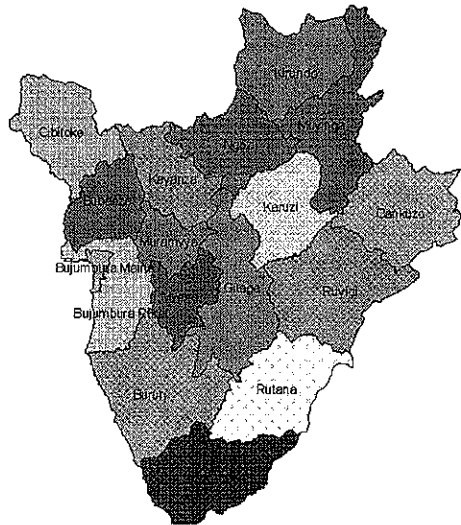
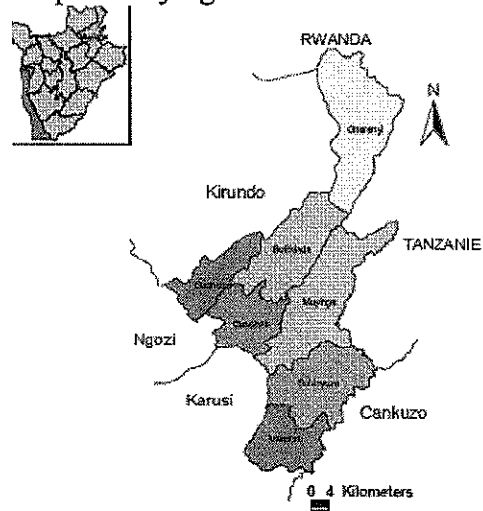
2.2 Locations Affected

Locations that will be affected are three watersheds respectively located in the provinces of Kayanza, Muyinga and Kirundo. These are Mbarara in Kayanza and part of Ngozi, Kankavyondo in Muyinga-Gashoho and Kadahoka-Ryarugamuna in Kirundo. Of particular to notice is that all these "marais"¹ or wetlands have been under cultivation at least for the last ten years. But because of poor maintenance, these are not properly used which makes them less productive than their potential (see hydrological map of Burundi below). Also depending on their location, some of them belong to the State while others are privately owned. This contradicts with the land law (see below environmental policy and procedures). The following maps show the affected provinces of Muyinga, Karuzi and Kirundo.

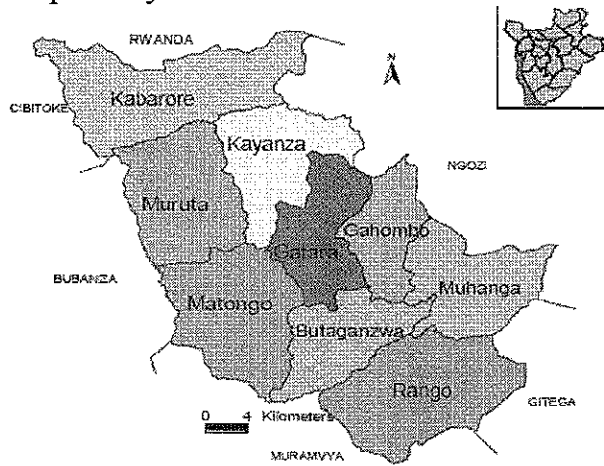
¹ In Burundi, the term « marais » refers to wetland areas in lowland inland valleys.



A map of Burundi showing its 18 provinces. The provinces are labeled: Gitega, Ngozi, Kirundi, Murundi, Kanyinyarwanda, Karama, Karuzi, Cankuzo, Bujumbura Mairie, Bujumbura Cite, Cankuzo, Rutana, Bururi, and Makamba. The map uses different patterns and shades of gray to distinguish between the provinces. The capital, Bujumbura, is located in the northwest, split between Bujumbura Mairie and Bujumbura Cite.

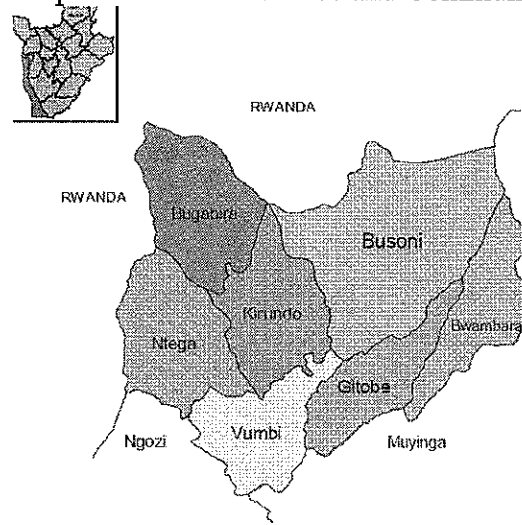
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A detailed map of Kayanza Province and its communes. The map shows the following communes: Kabarore, Muruta, Matongo, Butaganzwa, Rango, Cahombo, Muhanga, and Kayanza. Surrounding areas are labeled: RWANDA to the north, C'BITOKE to the west, BUBANZA to the southwest, MURAMVYA to the south, NGQZ to the northeast, and GITEGA to the east. A scale bar indicates 0 to 4 Kilometers. An inset map in the top right corner shows the location of Kayanza Province within the borders of Burundi.

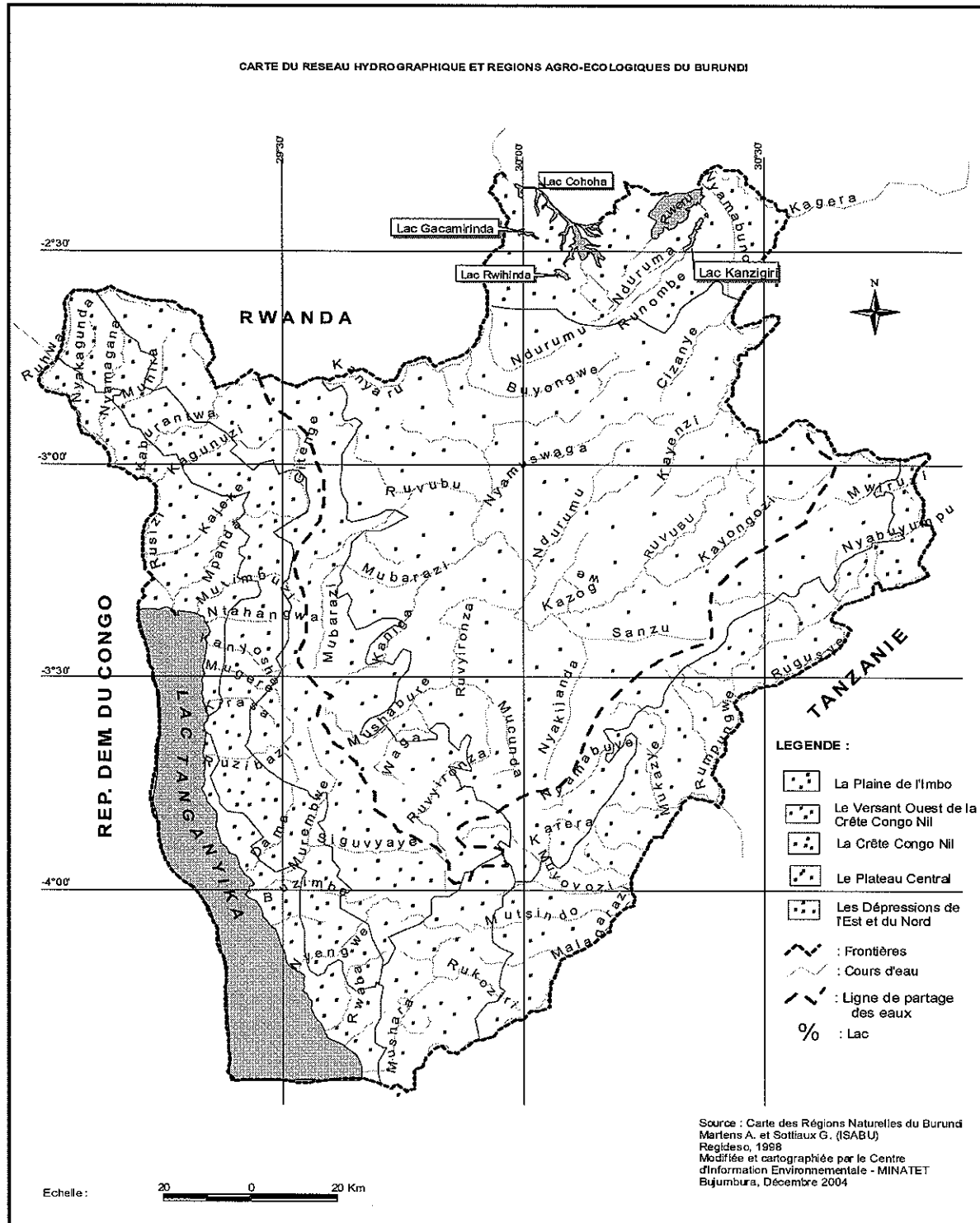


Map of Kirundo Province and Communes

A map of Kirundo Province in Mozambique, showing its eight communes: Bugatara, Busoni, Ntega, Kirundo, Ngozi, Vumbi, Glicoba, and Muinga. The province is bordered by Rwanda to the north and east. An inset map in the top left corner shows the location of Kirundo Province within Mozambique.



Map of the hydrologic network of Burundi



2.3 National Environmental Policies And Procedures

1. The environmental policy in Burundi has the following major objectives. These are dictated from the National Strategy for the Environment (SNEB) revised in 1997 and the Plan of Action for the Environment which is an implementation tool for the SNEB and the Leading Plan for Water (1998). This policy intends the following:

- ✓ Reforestation/afforestation and development of the forest heritage;
- ✓ Reinforcement of the management for the existing resources;
- ✓ Promotion of techniques which add value on transformed wood;
- ✓ Putting in place a program of research;
- ✓ Evaluation of water needs and its availability for its better use;
- ✓ Assessment of risks for water pollution;
- ✓ Assessment of air quality in Burundi and inventory of forms of pollution;
- ✓ Reestablishment and maintenance of ecological balance;
- ✓ Safeguard of the genetic heritage and biodiversity;
- ✓ Control all forms of pollution and contribute to the increase of production.

Source: Sector Policy of the Ministry of Land Management, Environment and Tourism

Code of environment

2. This is a major law regarding environment in Burundi. It is registered under the decree n°1/010 of June 30th 2000. However, very few people are aware of it. Its understanding - a knowledge of some of its fundamental principles, particularly article 5,6,7,8 &9, and also its basic concepts and definitions – is a necessity.

Other environmental legislation

The legal framework in regard to the environmental legislation in Burundi has the following laws:

- Ancient texts prior to independence concerning fishing (1932,1937,1961), hunting(1937), forest reserves (1934,1951,1954), dangerous establishments , unhealthy or incommode (1956);
- The decree 100/162 of December 6, 1979 on research and mining;
- The decree 1/6 of 3 mars 1980 concerning protected areas ;
- The decree 100/47 of March 3, 1982 for the creation of INCN (Institut National de la Conservation de la Nature), which become later INECN ;
- The Code on Public Health (1982) ;
- The law 1/6 of 25 May 1983 on Protection of National Cultural Heritage;
- The Law 1/02 of 25 March 1985 on Forest Code;
- The law 1/008 of September 1st 1986 on Land code;
- The decree 1/41 of November 26, 1992 on Public Waters;

- The decree 100/241 of December 31, 1992 regulating used waters in urban milieu
- The decree 1/003 of June 30, 1993 on Plant Protection,
- The ordinance 52/160 of November 16, 1995 regulating fishing in the lakes
- The decree 1/010 of June 30, 2000 on the Code of the Environment of the Republic of Burundi

3. Looking into these laws one finds that some of these are well formulated others are not. For example:

Forest exploitation: The legislation on forest exploitation requires permits for cutting and for charcoal manufacture, but uncontrolled cutting continues.

Mining Policy: A mining and petroleum code under its terms, concession rights are granted for a period of 25 years, with two ten-year extensions possible. But this code does not incorporate environmental concerns.

Water Policy: Under this law, groundwater belongs to the owner of the land, except where such water is subject to legislation regarding mining or the protection of public drinking water. Surface waters are treated two ways: private appropriation of small pools or streams is recognized, while running water is publicly appropriated. Navigable waters are part of the public domain. Several items of this legislation protect water quality while water pollution is prohibited.

Land Policy: This law is one of the major environmental legislation in Burundi. It distinguishes state-owned lands and private lands. State-owned lands belong to the public domain and they are inalienable. There are also those lands that belong to the State's public private domain, to the districts, public establishments and societies. On the other hand those lands which are not state-owned are either registered or attributed to customary. However, due to land scarcity, farmers are invading wetlands and remaining forests, while this legislation and the land tenure laws actually encourage the drainage of marshes. Local stakeholders find these laws unclear and their prohibition to access natural resources inadequate and unjust.

3.0 EVALUATION OF ACTIVITY / PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

3.1 Introduction

Many of the activities being proposed under the technical components of are related to training and the provision of the technical assistance and are having little impacts on the local environment. All the activities evaluated for their potential impacts and their threshold determination indicated in the table below.

3.2 Table 1. Activities and their potential impacts

Activity	Sub Activity	Potential Environmental Impact & Causes	Recommended Determinations
Distribution of food: for take-home rations, supplementary feeding programs, and food-for-		Has no biophysical interventions and therefore has no impacts on the environment.	CE 22 CFR 216.2 (c)(2)(viii) and (xi)

Activity	Sub Activity	Potential Environmental Impact & Causes	Recommended Determinations
assets activities			
Promotion of optimal infant and child feeding practices	Mobilize & sensitize communities: about mother & child nutrition and growth; on management of acute malnutrition	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(viii) and (xi)
	Establish Mother to Mother support groups	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(viii) and (xi)
	Implement PD HEARTH activities	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(viii) and (xi)
	Establish stabilization centers, outpatient therapeutic programs, and supplementary feeding programs	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(viii) and (xi)
	Strengthen both facility-based & community based growth monitoring & coaching	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(viii) and (xi)
	Provide VCBHAs with necessary equipment & training for growth monitoring	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(viii) and (xi)
Promote consumption of sufficient food in HIV-affected households	Train HIV-affected households in proper diets	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Create demonstration keyhole gardens	Likely to have impacts on environment as well as cumulative effects. The impacts are likely to be on soil, water and potential for introduction of invasive species	ND with conditions 22 CFR 216.3(a)(2) (iii)
Promotion of good health-seeking behaviors	Raise community awareness through IEC	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Train VCBHAs and MTMSGs on prevention and management of childhood illnesses	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Provide health kits to VCBHAs	Health kits are likely to result in generation of hazardous health waste that may pose health risks. This requires proper consideration to manage the disposal.	ND with conditions 22 CFR 216.3(a)(2) (iii)
Promotion of appropriate hygiene & sanitation practices	Mobilize community to maintain community water points	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Organize a 'star' campaign for top-performing households	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)

Activity	Sub Activity	Potential Environmental Impact & Causes	Recommended Determinations
	Train VCBHAs on hygiene and sanitation for potable water sources	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Implementation of selected strategies to encourage hygiene and sanitation practices – such as latrine usage	If the strategies include actual construction of latrines, this is likely to require careful sighting to avoid underground water contamination and spread of diseases.	ND with conditions 22 CFR 216.3(a)(2) (iii)
	Rehabilitation of existing potable water sources	Rehabilitation requires that water remains potable to avoid the risk of contamination of water sources.	ND with conditions 22 CFR 216.3(a)(2) (iii)
Promotion of improved production in environmentally sustainable ways	Facilitate organization of anti-erosion & tree production associations	Potential to exacerbate erosion and introduction of invasive species	CE 22 CFR 216.2 (c)(2)(i)
	Train farmers on: appropriate agricultural practices for improving crop & livestock production, including soil erosion prevention, use of organic fertilizer, composting, crop & animal disease prevention & control, & proper seed management	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Provide tools and other inputs to community associations for tree production initiatives and ensure implementation through Food For Assets work programs	Potential to exacerbate erosion and introduction of invasive species	ND with conditions 22 CFR 216.3(a)(2) (iii)
	Organize a Food For Assets program on erosion control for targeted hillsides	Potential to exacerbate erosion and introduction of invasive species	ND with conditions 22 CFR 216.3(a)(2) (iii)
	Rehabilitate targeted lowland inland valleys using a Food for Assets program	Potential to exacerbate ecosystem degradation including drying of wetlands playing a critical role in ecosystem integrity.	ND with conditions 22 CFR 216.3(a)(2) (iii)
	Train farmers in lowland inland valley mgmt techniques	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Train extension agents to improve their extension skills & in appropriate NRM techniques	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Sensitize farmers on benefits of diversifying their crop & livestock portfolios	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)

Activity	Sub Activity	Potential Environmental Impact & Causes	Recommended Determinations
	Expose farmers to improved crop varieties	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Introduce new crop varieties through local demonstration plots	Potential to introduce invasive species	ND with conditions 22 CFR 216.3(a)(2) (iii)
Promote strategies & techniques to diversify & increase revenues	Sensitize community leaders to the SILC methodology	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Train selected community members in SILC methodology	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Organize community meetings on collective producing & marketing	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Train farmers on sustainable agro-enterprise methodologies & post-harvest practices	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Train farmers groups on identifying & using business development services & good internal mgmt practices	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Train extension agents on improved production techniques & on animal & plant disease prevention / control	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
Promote establishment of community-based early warning & response action plans	Train community leaders on risk & livelihoods assessment	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Train local leaders in creation of action plans that respond to shocks	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Promote linkages with FAO's food security early warning system	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Assist communities in creating action plans	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Provide small grants to enable communities to begin implementing their action plan	Projects not properly evaluated before funding could harm the environment	ND with conditions 22 CFR 216.3(a) (2)(iii)
Promote efficient management of	Train community leaders in women's rights	No negative impact anticipated	CE 22 CFR 216.2

Activity	Sub Activity	Potential Environmental Impact & Causes	Recommended Determinations
household assets in an equitable manner			(c)(2)(i)
	Train men & women in women's rights & gender-balanced responsibilities	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Organize 'positive deviant' working sessions on mutual decision making & mgmt of household assets	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
	Promote linkages with national women's rights and advocacy groups/NGOs	No negative impact anticipated	CE 22 CFR 216.2 (c)(2)(i)
Monetization sale of Title II Commodities		No negative impacts anticipated	CE 22 CFR 216.2 (c)(2)(iii)

4.0 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

4.1 Summary of the recommended determinations, mitigation measures and Conditions

A recommendation for *categorical exclusion* is requested for the following activities:

Pursuant to 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc): (iii) Analysis, studies, academic or research workshops and meetings; (viii) programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); and (xi) programs of maternal or child feeding conducted under Title II of [Public Law]480

Distribution of food: for take-home rations, supplementary feeding programs, and food-for-assets activities

Promotion of optimal infant and child feeding practices

- Mobilize & sensitize communities: about mother & child nutrition and growth; on management of acute malnutrition
- Establish Mother to Mother support groups
- Implement PD HEALTH activities
- Establish stabilization centers, outpatient therapeutic programs, and supplementary feeding programs
- Strengthen both facility-based & community based growth monitoring & coaching
- Provide VCBHAs with necessary equipment & training for growth monitoring

Promote consumption of sufficient food in HIV-affected households

- Train HIV-affected households in proper diets

Promotion of good health-seeking behaviors

Raise community awareness through IEC

Train VCBHAs and MTMSGs on prevention and management of childhood illnesses

Promotion of appropriate hygiene & sanitation practices

Mobilize community to maintain community water points

Organize a 'star' campaign for top-performing households

Train VCBHAs on hygiene and sanitation for potable water sources

Promotion of improved production in environmentally sustainable ways

Facilitate organization of anti-erosion & tree production associations

Train farmers on: appropriate agricultural practices, etc.

Train farmers in lowland inland valley mgmt techniques

Train extension agents to improve their extension skills & in appropriate NRM techniques

Sensitize farmers on benefits of diversifying their crop & livestock portfolios

Expose farmers to improved crop varieties

Promote strategies & techniques to diversify & increase revenues

Sensitize community leaders to the SILC methodology

Train selected community members in SILC methodology

Organize community meetings on collective producing & marketing

Train farmers on sustainable agro-enterprise methodologies & post-harvest practices

Train farmers groups on identifying & using business development services & good internal management practices

Train extension agents on improved production techniques & on animal & plant disease prevention control

Promote establishment of community-based early warning & response action plans

Train community leaders on risk & livelihoods assessment

Train local leaders in creation of action plans that respond to shocks

Promote linkages with FAO's food security early warning system

Assist communities in creating action plans

Provide small grants to enable communities to begin implementing their action plan

Promote efficient management of household assets in an equitable manner

Train community leaders in women's rights

Train men & women in women's rights & gender-balanced responsibilities

Organize 'positive deviant' working sessions on mutual decision making & mgmt of household assets

Promote linkages with national women's rights and advocacy groups/NGOs

Monetization sale of Title II Commodities**2. Negative Determinations:**

- i) **A Negative Determination with Conditions** per 22 CFR 216.3 (a)(2)(iii) is recommended for these activities:

Promote consumption of sufficient food in HIV-affected households

Create demonstration keyhole gardens

Promotion of good health-seeking behaviors

Provide health kits to VCBHAs

Promotion of appropriate hygiene & sanitation practices

Implementation of selected strategies to encourage hygiene and sanitation practices – such as latrine usage

Rehabilitation of existing potable water sources

Promotion of improved production in environmentally sustainable ways

Provide tools and other inputs to community associations for tree production initiatives and ensure implementation through Food For Assets work programs

Organize a Food For Assets program on erosion control for targeted hillsides

Rehabilitate targeted lowland inland valleys using a Food for Assets program

Introduce new crop varieties through local demonstration plots

The conditions attached to these activities shall include the following:

- For the rehabilitation of existing facilities, and for construction of facilities in which the total surface area disturbed is less than 10,000 square feet, the condition is that these activities shall be conducted following principles for environmentally sound construction, as provided in the Small Scale Construction chapter of the USAID Environmental Guidelines for Small-scale Activities in Africa, which can be found at: www.encapafrika.org.
- For activities associated with seeds, seed supply and planting materials ;
 - **Conditions:** Suppliers shall: 1) ensure appropriateness for the agro-climatic zone to which they are being introduced; 2) avoid introducing exotic invasive species; and 3) avoid providing or promoting genetically modified organisms (GMOs). This requires identifying and mitigating any potential direct adverse impacts on the physical environment and human health and safety (such as due to aflatoxin contamination) arising from distribution of free seeds.
 - **Condition:** non-native plants will not be introduced into protected areas
- For introduction and dissemination of other agricultural chemicals such as fertilizers (not including pesticides) training should be provided in product knowledge. Program activities will use **best management practices for soil fertility and health, as described below:**
 - Integrated Soil Fertility Management (ISFM) – the use of both organic and inorganic sources of nutrients rather than either alone;
 - The use of legume cover crops (plus phosphorous) and green manures by fallow rotation or intercropping;
 - Agro forestry practices – in addition to soil conservation and production benefits, agro forestry transfers/cycles nutrients from within the soil profile (deeper levels to surface);
 - The use of conservation tillage rather than deep plowing (although conservation tillage can be harmful for production systems in certain regions²);
 - Use farm site manures and household wastes, with or without composting;
 - Choose crops and associated plants that have high nutrient use efficiency.
- Fertilizers: As with any technology, it is recommended that fertilizers be thoughtfully employed according to best practice, promoting integrated soil fertility management, within the context of the prevailing biophysical and socio-economic conditions, as well as the desired outcomes. This

fact sheet was developed to assist in that regard.

- *Water and Sanitation conditions:*

Potential for adverse environmental impacts from water and sanitation activities exists, and it is the responsibility of program designers and implementers to avoid such impacts to the extent possible. Both water supply and sanitation activities should be conducted in a manner consistent with the good design and implementation practices described in *EGSSAA Chapter 16: Water Supply and Sanitation*. The SO Team and implementing partners shall use the information contained in this chapter, as it provides a thorough discussion of program design and implementation issues that can help avoid numerous preventable problems. Another useful reference to consult for good water and sanitation design and implementation principles is the document, “Guidelines for the Development of Small Scale Rural Water Supply and Sanitation Projects in Ethiopia,” by Catholic Relief Services and USAID, July 31, 2003. Water quality testing is essential for determining that the water from a constructed water source is safe to drink and to determine a baseline so that any future degradation can be detected. Among the water quality tests which must be performed are tests for the presence of arsenic. Any USAID-supported activity engaged in the provision of potable water must adhere to Guidance Cable State 98 108651, which requires arsenic testing. That 1998 cable also anticipates “practical guidelines on sampling and testing for arsenic” that were then under development. The EGAT Bureau completed these guidelines, and the Africa Bureau has packaged them in a document titled, “Guidelines for Determining the Arsenic Content of Ground Water in USAID-Sponsored Well Programs in Sub-Saharan Africa.” The SO team must assure that the standards and testing procedures described in this guideline document are followed for potable water supply activities under this program.

- **Medical Waste:** Although small-scale healthcare activities provide many important benefits to communities, they can also unintentionally do great harm through poor design and management of waste management systems. Healthcare waste is dangerous. If handled, treated, disposed of incorrectly it can spread disease, poisoning people, livestock, wild animals, plants and whole ecosystems.

Conditions:

For VCBHAs, who will use their health kits for basic first aid and treatment activities, the SO team must work with its implementing partners to assure, to the extent possible, that the medical facilities and operations involved have adequate procedures and capacities in place to properly handle, label, treat, store, transport and properly dispose of blood, sharps and other medical waste. The ability of the Team to assure such procedures and capacity is understood to be limited by its level of control over the management of the facilities and operations that USAID/Burundi is supporting.

The USAID Bureau for Africa’s Environmental Guidelines for Small Scale Activities in Africa (EGSSAA) Chapter 8, “Healthcare Waste: Generation, Handling, Treatment and Disposal” (found at this URL: <http://encapafrica.org/SmallScaleGuidelines.htm>) contains guidance which should inform the Team’s activities to promote proper handling and disposal of medical waste, particularly in the section titled, “Minimum elements of a complete waste management program.”

ii) Negative Determination with conditions (Umbrella IEE)

The following activities are determined to qualify for Negative Determinations with Conditions (22 CFR 216.3(a)(2) (iii)). MYAP/Burundi **has developed design criteria for such actions which, if applied in the design of the action, will avoid a significant effect on the environment:**

(All activities involving sub grant activities) for all program areas that are likely to have sub-grants to local Non Governmental Organizations (NGOs) and Community Based Organizations (CBOs) including:

Promote establishment of community-based early warning & response action plans

Provide small grants to enable communities to begin implementing their action plan

Any grants or other monetary transfers of USAID funds (e.g., sub-grants) to support this program's activities must incorporate provisions that the activities to be undertaken will comply with the environmental determinations and recommendations of this IEE (see section 4.1.4 for details and the Environmental Review Form sample at <http://www.encapafrika.org/compliance.htm>). This includes assurance that the activities conducted with USAID funds fit within those described in the approved IEE or IEE amendment and that any mitigating measures required for those activities be followed.

Condition: In the event that sub-grants and small grants will support activities with the potential for impact on the environment, FFP, USAID /Burundi and the implementing partners have the responsibility for assuring that an environmental screening process is introduced using the Africa Bureau Environmental Review Form (see annex) in their sub-grant procedures.

3. Pesticides and GMOs: This IEE does not cover procurement, use, transport, storage or disposal of pesticides or other toxic materials, which would require an amended IEE, pursuant to 22 CFR 216.3(b), USAID's Pesticide Procedures. Likewise, any activities implicating the testing and use of genetically-modified organisms (GMOs) or life-modified organisms (LMOs) shall be subject to review under the Agency's Biosafety procedures.

4. Monitoring and Evaluation: As required by ADS 204.3.4, the USAID LPC/Somalia team and activity implementing partners will actively monitor and evaluate whether the environmental features designed for the activity resulting from the 22 CFR 216 process are being implemented effectively and whether there are new or unforeseen consequences arising during implementation that were not identified and reviewed. If additional activities not described in this document are added to this program, an amended environmental examination must be prepared and approved. The USAID/Somalia team will also ensure that provisions of the IEE concerning mitigative measures and the conditions specified herein along with the requirement to monitor be incorporated in all contracts, cooperative agreements, grants and sub-grants.

4.2 Other specific Mitigation actions and recommendations

The intent of the mitigation actions and conditions detailed in this section is to assure that no sub-grant activities with significant adverse environmental impacts are implemented under this project. These environmental screening and review procedures specify how activities will be examined on an individual basis to comply with the determinations of this IEE in accordance with Reg. 216. These procedures are intended to result in environmental accountability and soundness, by requiring that the MYAP and local partners put in place specific mechanisms to promote environmental review capacity and other environmental capacity. To ensure that interventions are designed in a sound and sustainable manner,

MYAP will work with the appropriate USAID and national officers to achieve compliance with these procedures.

4.2a Environmental Screening and Review Procedures

Environmental screening and review procedures will be adopted for all sub-grant activities not defined at the time of the proposal.

These procedures are set out in the attached draft Environmental Review Form and accompanying

Environmental Review Form instructions. MYAP will prepare or cause to be prepared the appropriate documentation for each activity.

Under these procedures, each activity in a sub grant will result in one of three screening results:

- Very low risk
- Moderate or unknown risk
- High-risk

Activities found to be (1) high risk or (2) moderate/unknown risk will require completion of an environmental review. For each activity, the environmental review will result in one of three possible recommended determinations:

- No significant adverse impacts
- No significant adverse impacts given specified mitigation and monitoring
- Significant adverse impacts

Final review and clearance authority for the environmental documentation form will lie with the Regional Environmental Advisor (REA), with two exceptions:

- The environmental reviews and recommended determinations for any “high risk” activities will require clearance by the Regional Environmental Advisor (REA), the Regional Food For Peace Officer and the Bureau Environmental Officer (BEO).
- Recommended determinations indicating “significant adverse impacts” will incur Regulation 216 (22 CFR 216) requirements for the conduct of an Environmental Assessment.

No sub grant funds will be awarded until environmental documentation for the sub grant activity has undergone final review and clearance.

This clearance is granted on the condition that all mitigation and monitoring measures specified in the environmental review are binding requirements.

4.2b Adherence to national environmental laws and regulations

The environmental screening and review procedures described in 4.1a do not substitute for the environmental laws and policies of the host country.

4.2c Adherence to USAID pesticide procedures

This IEE does not cover pesticides or other activities involving procurement, use, transport, storage or disposal of toxic materials. Except as noted in the attached Environmental Review Form any pesticide activities will require an amended IEE.

4.3 ENVIRONMENTAL RESPONSIBILITIES

CRS will be responsible for environmental and screening review procedures which are based on the use of a screening form. This form is consistent with “environmental screening form for NGO/PVO Activities and Grants proposals” contained in the *Africa Bureau Environmental Guidelines for Small-Scale Activities in Africa*. The environmental procedures will result in environmental soundness and accountability, by requiring CRS Burundi and local partners to put in place specific mechanisms that promote environmental review capacity and environmental capacity building.

In addition, CRS’ MYAP activities are intended to improve upon the “way to do things” for usual and regular community development activities. However, this improvement is rather linked to technical aspects including training, experience building and good practices in regard to the environment.

To achieve all the above, CRS Burundi will work with the appropriate USAID and national officers for better compliance, efficiency and effectiveness.

5.1 SUMMARY OF FINDINGS

Summary of the recommended determinations, mitigation measures and Conditions

A recommendation for *categorical exclusion* is requested for the following activities:

Pursuant to 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc): (iii) Analysis, studies, academic or research workshops and meetings; (viii) programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.); and (xi) programs of maternal or child feeding conducted under Title II of [Public Law]480

Distribution of food: for take-home rations, supplementary feeding programs, and food-for-assets activities

Promotion of optimal infant and child feeding practices

- Mobilize & sensitize communities: about mother & child nutrition and growth; on management of acute malnutrition

- Establish Mother to Mother support groups

- Implement PD HEALTH activities

- Establish stabilization centers, outpatient therapeutic programs, and supplementary feeding programs

- Strengthen both facility-based & community based growth monitoring & coaching

- Provide VCBHAs with necessary equipment & training for growth monitoring

Promote consumption of sufficient food in HIV-affected households

Train HIV-affected households in proper diets

Promotion of good health-seeking behaviors

Raise community awareness through IEC

Train VCBHAs and MTMSGs on prevention and management of childhood illnesses

Promotion of appropriate hygiene & sanitation practices

Mobilize community to maintain community water points

Organize a 'star' campaign for top-performing households

Train VCBHAs on hygiene and sanitation for potable water sources

Promotion of improved production in environmentally sustainable ways

Facilitate organization of anti-erosion & tree production associations

Train farmers on: appropriate agricultural practices , etc.

Train farmers in lowland inland valley mgmt techniques

Train extension agents to improve their extension skills & in appropriate NRM techniques

Sensitize farmers on benefits of diversifying their crop & livestock portfolios

Expose farmers to improved crop varieties

Promote strategies & techniques to diversify & increase revenues

Sensitize community leaders to the SILC methodology

Train selected community members in SILC methodology

Organize community meetings on collective producing & marketing

Train farmers on sustainable agro-enterprise methodologies& post-harvest practices

Train farmers groups on identifying & using business development services & good internal management practices

Train extension agents on improved production techniques & on animal & plant disease prevention control

Promote establishment of community-based early warning & response action plans

Train community leaders on risk & livelihoods assessment

Train local leaders in creation of action plans that respond to shocks

Promote linkages with FAO's food security early warning system

Assist communities in creating action plans

Provide small grants to enable communities to begin implementing their action plan

Promote efficient management of household assets in an equitable manner

Train community leaders in women's rights

Train men & women in women's rights & gender-balanced responsibilities

Organize 'positive deviant' working sessions on mutual decision making & mgmt or household assets

Promote linkages with national women's rights and advocacy groups/NGOs

Monetization sale of Title II Commodities**2. Negative Determinations:**

- ii) A Negative Determination with Conditions per 22 CFR 216.3 (a)(2)(iii) is recommended for these activities:

Promote consumption of sufficient food in HIV-affected households

Create demonstration keyhole gardens

Promotion of good health-seeking behaviors

Provide health kits to VCBHAs

Promotion of appropriate hygiene & sanitation practices

Implementation of selected strategies to encourage hygiene and sanitation practices – such as latrine usage

Rehabilitation of existing potable water sources

Promotion of improved production in environmentally sustainable ways

Provide tools and other inputs to community associations for tree production initiatives and ensure implementation through Food For Assets work programs

Organize a Food For Assets program on erosion control for targeted hillsides

Rehabilitate targeted lowland inland valleys using a Food for Assets program

Introduce new crop varieties through local demonstration plots

The conditions attached to these activities shall include the following:

- For the rehabilitation of existing facilities, and for construction of facilities in which the total surface area disturbed is less than 10,000 square feet, the condition is that these activities shall be conducted following principles for environmentally sound construction, as provided in the Small Scale Construction chapter of the USAID Environmental Guidelines for Small-scale Activities in Africa, which can be found at: www.encapafrica.org.
- For activities associated with seeds, seed supply and planting materials ;
 - **Conditions:** Suppliers shall: 1) ensure appropriateness for the agro-climatic zone to which they are being introduced; 2) avoid introducing exotic invasive species; and 3) avoid providing or promoting genetically modified organisms (GMOs). This requires identifying and mitigating any potential direct adverse impacts on the physical environment and human health and safety (such as due to aflatoxin contamination) arising from distribution of free seeds.
 - **Condition:** non-native plants will not be introduced into protected areas
- For introduction and dissemination of other agricultural chemicals such as fertilizers (not including pesticides) training should be provided in product knowledge. Program activities will use ***best management practices for soil fertility and health, as described below:***
 - Integrated Soil Fertility Management (ISFM) – the use of both organic and inorganic sources of nutrients rather than either alone;
 - The use of legume cover crops (plus phosphorous) and green manures by fallow rotation or intercropping;
 - Agro forestry practices – in addition to soil conservation and production benefits, agro forestry transfers/cycles nutrients from within the soil profile (deeper levels to surface);
 - The use of conservation tillage rather than deep plowing (although conservation tillage can be harmful for production systems in certain regions²);
 - Use farm site manures and household wastes, with or without composting;
 - Choose crops and associated plants that have high nutrient use efficiency.
- Fertilizers: As with any technology, it is recommended that fertilizers be thoughtfully employed

according to best practice, promoting integrated soil fertility management, within the context of the prevailing biophysical and socio-economic conditions, as well as the desired outcomes. This fact sheet was developed to assist in that regard.

- *Water and Sanitation conditions:*

Potential for adverse environmental impacts from water and sanitation activities exists, and it is the responsibility of program designers and implementers to avoid such impacts to the extent possible. Both water supply and sanitation activities should be conducted in a manner consistent with the good design and implementation practices described in *EGSSAA Chapter 16: Water Supply and Sanitation*. The SO Team and implementing partners shall use the information contained in this chapter, as it provides a thorough discussion of program design and implementation issues that can help avoid numerous preventable problems. Another useful reference to consult for good water and sanitation design and implementation principles is the document, “Guidelines for the Development of Small Scale Rural Water Supply and Sanitation Projects in Ethiopia,” by Catholic Relief Services and USAID, July 31, 2003. Water quality testing is essential for determining that the water from a constructed water source is safe to drink and to determine a baseline so that any future degradation can be detected. Among the water quality tests which must be performed are tests for the presence of arsenic. Any USAID-supported activity engaged in the provision of potable water must adhere to Guidance Cable State 98 108651, which requires arsenic testing. That 1998 cable also anticipates “practical guidelines on sampling and testing for arsenic” that were then under development. The EGAT Bureau completed these guidelines, and the Africa Bureau has packaged them in a document titled, “Guidelines for Determining the Arsenic Content of Ground Water in USAID-Sponsored Well Programs in Sub-Saharan Africa.” The SO team must assure that the standards and testing procedures described in this guideline document are followed for potable water supply activities under this program.

- **Medical Waste:** Although small-scale healthcare activities provide many important benefits to communities, they can also unintentionally do great harm through poor design and management of waste management systems. Healthcare waste is dangerous. If handled, treated, disposed of incorrectly it can spread disease, poisoning people, livestock, wild animals, plants and whole ecosystems.

Conditions:

For VCBHAs, who will use their health kits for basic first aid and treatment activities, the SO team must work with its implementing partners to assure, to the extent possible, that the medical facilities and operations involved have adequate procedures and capacities in place to properly handle, label, treat, store, transport and properly dispose of blood, sharps and other medical waste. The ability of the Team to assure such procedures and capacity is understood to be limited by its level of control over the management of the facilities and operations that USAID/Burundi is supporting.

The USAID Bureau for Africa’s Environmental Guidelines for Small Scale Activities in Africa (EGSSAA) Chapter 8, “Healthcare Waste: Generation, Handling, Treatment and Disposal” (found at this URL: <http://encapafrica.org/SmallScaleGuidelines.htm>) contains guidance which should inform the Team’s activities to promote proper handling and disposal of medical waste, particularly in the section titled, “Minimum elements of a complete waste management program.”

ii) Negative Determination with conditions (Umbrella IEE)

The following activities are determined to qualify for Negative Determinations with Conditions (22 CFR 216.3(a)(2) (iii)). MYAP/Burundi **has developed design criteria for such actions which, if applied in the design of the action, will avoid a significant effect on the environment:**

(All activities involving sub grant activities) for all program areas that are likely to have sub-grants to local Non Governmental Organizations (NGOs) and Community Based Organizations (CBOs) including:

Promote establishment of community-based early warning & response action plans

Provide small grants to enable communities to begin implementing their action plan

Any grants or other monetary transfers of USAID funds (e.g., sub-grants) to support this program's activities must incorporate provisions that the activities to be undertaken will comply with the environmental determinations and recommendations of this IEE (see section 4.1.4 for details and the Environmental Review Form sample at <http://www.encapafrika.org/compliance.htm>). This includes assurance that the activities conducted with USAID funds fit within those described in the approved IEE or IEE amendment and that any mitigating measures required for those activities be followed.

Condition: In the event that sub-grants and small grants will support activities with the potential for impact on the environment, FFP, USAID /Burundi and the implementing partners have the responsibility for assuring that an environmental screening process is introduced using the Africa Bureau Environmental Review Form (see annex) in their sub-grant procedures.

3. Pesticides and GMOs: This IEE does not cover procurement, use, transport, storage or disposal of pesticides or other toxic materials, which would require an amended IEE, pursuant to 22 CFR 216.3(b), USAID's Pesticide Procedures. Likewise, any activities implicating the testing and use of genetically-modified organisms (GMOs) or life-modified organisms (LMOs) shall be subject to review under the Agency's Biosafety procedures.

4. Monitoring and Evaluation: As required by ADS 204.3.4, the USAID LPC/Somalia team and activity implementing partners will actively monitor and evaluate whether the environmental features designed for the activity resulting from the 22 CFR 216 process are being implemented effectively and whether there are new or unforeseen consequences arising during implementation that were not identified and reviewed. If additional activities not described in this document are added to this program, an amended environmental examination must be prepared and approved. The USAID/Somalia team will also ensure that provisions of the IEE concerning mitigative measures and the conditions specified herein along with the requirement to monitor be incorporated in all contracts, cooperative agreements, grants and sub-grants.